

AO91 (Rev. 12/03) Criminal Complaint

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

TENNESSEE

UNITED STATES OF AMERICA
V.ROBERT L. BROWN
and
JONATHAN W. WILLIAMS

CRIMINAL COMPLAINT

Case Number: 08-MJ-008

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 1/19/2008 in Shelby County, in the Western District of Tennessee defendant(s) did,

(Track Statutory Language of Offense)


did affect commerce by robbery and did use and carry a firearm during and in relation to a crime of violence

in violation of Title 18 United States Code, Section(s) 1951 and 924(c).

I further state that I am a(n) Officer, Memphis Police Department and that this complaint is based on the following facts:

Official Title

See attached affidavit.

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No


Signature of Complainant

Walter Gunn

Printed Name of Complainant

Sworn to before me and signed in my presence,

1/23/2008

Date

at

MEMPHIS

City

TENNESSEE

State

JAMES H. ALLEN

Name of Judge

U. S. Mag. Judge

Title of Judge

(s/ James H. Allen

Signature of Judge

AFFIDAVIT

I, Walter Gunn, being duly sworn on oath, hereby depose and state as follows:

1. I am a Detective with the Memphis Police Department and have been so employed for 9 years. I am presently assigned to the Safe Streets Task Force with the duty of investigating Business Robberies. The following facts are based upon my personal knowledge, upon information provided by other law enforcement officers, and upon information provided by witnesses at the scene of the Robbery 1985 East Brooks Road, the Burger King.

2. On January 19, 2008 at approximately 7:00 p.m. two males entered the Burger King located at 1985 East Brooks Road Memphis, Tennessee. The males were armed with silver handguns and were wearing bandanas on their faces. The males confronted the employees and forced them to surrender the cash from the register and the safe. The males then left the scene driving a silver Buick LeSabre with no tags and tinted windows.


3. Officers began checking the area and located a similar vehicle at Graceland and Winchester Memphis, Tennessee. The vehicle was driven by a Jonathan Williams. Officers noticed the tag on the rear of the car was secured by two screws on opposite sides. Officers approached the

vehicle and observed a large amount of cash in the center console. The money was visible from outside the vehicle. Williams was placed under arrest and the vehicle was inventoried for towing. Officers located a loaded silver revolver, two bandanas and other clothing in the truck of the vehicle.

4. Jonathan Williams was taken to 201 Poplar and advised of his Miranda Rights. Williams waived his rights and gave a typed statement of admission. He gave details supporting his confession. Williams named Robert Brown as the male who participated in the robbery with him.

5. On January 21, 2008 Robert Brown turned himself in the Memphis Police Officers at 1925 Union Memphis, Tennessee. Brown was taken to 201 Poplar and advised of his Miranda Rights. Brown waived his rights and he gave a typed statement of admission. In his statement Brown gave details of the robbery that supported his confession.

6. The Burger King located at 1985 East Brooks is a business that is involved in Interstate Commerce.



Walter Gunn
FBI Safe Streets Task Force

